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Siddharth Hariharan

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SIDDHARTH HARIHARAN, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

ADOBE SYSTEMS INC., APPLE INC.,
GOOGLE INC., INTEL CORP., INTUIT
INC., LUCASFILM LTD., PIXAR, and
DOES 1-200,

Defendants.

Case No. C 11-2509 SBA

**DECLARATION OF DEAN M. HARVEY
IN SUPPORT OF PLAINTIFF'S
RESPONSE TO DEFENDANTS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED**

I, Dean M. Harvey, declare:

1. I am a member in good standing of the State Bar of California and am admitted to practice in United States District Court for the Northern District of California. I am an associate with the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP, attorneys for plaintiff Siddharth Hariharan in the above-captioned action. I submit this Declaration in Support of Plaintiff's Response to Defendants' Administrative Motion to Consider Whether Cases Should be Related. I have personal knowledge of the facts set forth in this Declaration. If called as a witness, I could and would testify competently to them.

2. On June 29, 2011, Plaintiffs provided Defendants with courtesy copies of the complaints filed in *Michael Devine v. Adobe Systems Inc., Apple Inc., Google Inc., Intel Corp., Intuit Inc., Lucasfilm Ltd., Pixar, and Does 1-200*, Case No. 111-cv-204053 (Santa Clara Superior Court), and *Brandon Marshall v. Adobe Systems Inc., Apple Inc., Google Inc., Intel Corp., Intuit Inc., Lucasfilm Ltd., Pixar, and Does 1-200*, Case No. 111-cv-204052 (Santa Clara Superior Court). Plaintiffs also requested that Defendants provide times for later that week when they would be available to meet and confer regarding coordination of the actions. Defendants did not respond to the request. Attached hereto as **Exhibit A** is a true and correct copy of the June 29, 2011 email I sent to Defendants' counsel.

3. On June 30, 2011, Plaintiffs provided Defendants with a courtesy copy of the complaint filed in *Mark Fichtner v. Adobe Systems Inc., Apple Inc., Google Inc., Intel Corp., Intuit Inc., Lucasfilm Ltd., Pixar, and Does 1-200*, Case No. 111-cv-204187 (Santa Clara Superior Court). Plaintiffs again requested that Defendants meet and confer regarding coordination of the actions. Defendants did not respond to the request. Attached hereto as **Exhibit B** is a true and correct copy of the June 20, 2011 email I sent to Defendants' counsel.

4. On July 14, 2011, Plaintiffs provided Defendants with a courtesy copy of the complaint filed in *Daniel Stover v. Adobe Systems Inc., Apple Inc., Google Inc., Intel Corp., Intuit Inc., Lucasfilm Ltd., Pixar, and Does 1-200*, Case No. 111-cv-205090 (Santa Clara Superior Court). Plaintiffs again requested that Defendants meet and confer regarding coordination. Defendants have not responded to the request. Attached hereto as **Exhibit C** is a true and correct copy of the July 14, 2011 email I sent to Defendants' counsel.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 20th day of July, 2011, in San Francisco, California.

/s/ Dean M. Harvey
DEAN M. HARVEY